

EXHIBIT A



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19PT-CC00089 - SUZANNE STEINBACH V MAXION WHEELS SEDALIA LLC (E-CASE)

Case Header	Parties & Attorneys	Docket Entries	Charges, Judgments & Sentences	Service Information	Filings Due	Scheduled Hearings & Trials	Civil Judgments	Garnishments/ Execution
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08/14/2019 ☐ [Corporation Served](#)

Document ID - 19-SMCC-240; Served To - MAXION WHEELS SEDALIA LLC; Server - SO COLE COUNTY-JEFFERSON CITY; Served Date - 02-AUG-19; Served Time - 08:00:00; Service Type - Sheriff Department; Reason Description - Served

07/26/2019 ☐ [Summons Issued-Circuit](#)

Document ID: 19-SMCC-240, for MAXION WHEELS SEDALIA LLC.

☐ [Summons Withdrawn](#)

Document ID - 19-SMCC-233; Served To - MAXION WHEELS SEDALIA LLC; Server - PETTIS COUNTY SHERIFF DEPT; Served Date - 26-JUL-19; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Recalled/Withdrawn; Service Text - Recalled and reissued at request of atty to be served on reg agt

☐ [Judge/Clerk - Note](#)

Attorney's office has now added registered agent to defendant and requested service on this registered agent. Summons. Clerk will recall previous summons and reissue with the registered agent. (7)

☐ [Note to Clerk eFiling](#)

Filed By: GAYLE ELAINE MCVAY

☐ [Correspondence Filed](#)

Letter to Circuit Clerk requesting reissue of Summons to Registered Agent for Defendant; Electronic Filing Certificate of Service.

Filed By: GAYLE ELAINE MCVAY

On Behalf Of: SUZANNE RENEE STEINBACH

07/23/2019 ☐ [Summons Issued-Circuit](#)

Document ID: 19-SMCC-233, for MAXION WHEELS SEDALIA LLC.

07/22/2019 ☐ [Filing Info Sheet eFiling](#)

Filed By: J KIRK RAHM

☐ [Pet Filed in Circuit Ct](#)

Petition.

On Behalf Of: SUZANNE RENEE STEINBACH

☐ [Judge Assigned](#)

Case.net Version 5.14.0.11

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Released 04/25/2019

IN THE CIRCUIT COURT OF PETTIS COUNTY, MISSOURI

Suzanne Steinbach,)	
)	
Plaintiff,)	
v.)	
)	
Maxion Wheels Sedalia LLC)	Case No.
Serve: Registered Agent)	
CSC-LAWYERS)	Jury Trial Requested
INCORPORATING SERVICE)	
COMPANY)	
221 Bolivar Street)	
Jefferson City, MO 65101)	
Phone: (660) 827-3640)	
)	
Defendant)	

PETITION

COMES NOW Plaintiff Suzanne Steinbach and for her cause of action against Defendant Maxion Wheels Sedalia LLC states:

PARTIES

1. Plaintiff Suzanne Steinbach is an adult woman and resident of Illinois. She opposed practices prohibited by the Missouri Human Rights Act and filed a Charge of Discrimination with the Missouri Commission on Human Rights (E-02/18-49094). As a result, Plaintiff experienced retaliation from her employer.
2. Defendant is a foreign LLC that at all times relevant to this action owned, controlled, operated, and oversaw a wheel manufacturing plant at 3610 W Main Street in Sedalia, Pettis County, Missouri, where Plaintiff Suzanne Steinbach worked.
 - a. Defendant was at all times relevant herein an “employer” of Plaintiff Suzanne Steinbach as defined by the Missouri Human Rights Act, § 213.010(8).

- b. Defendant can be served through its registered agent, CSC-Lawyers Incorporating Service Company, 221 Bolivar Street, Jefferson City, MO 65101.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction under Mo. Const. art. V, § 14, and under Mo. Rev. Stat. § 213.010, *et seq.*, the Missouri Human Rights Act.
4. This Court has personal jurisdiction under Mo. Rev. Stat. § 506.500, *et seq.*, because, among other things, Defendant's transaction of business in this state gives rise to the causes of action asserted here.
5. Venue is in the Circuit Court of Pettis County, Missouri, because the unlawful practices described herein occurred in Pettis County, Missouri.
6. On October 25, 2018, Plaintiff timely filed a Charge of Discrimination with the Missouri Commission on Human Rights pursuant to Mo. Rev. Stat. § 213.075. The charge number for that Charge was E-10/18-50181. A Notice of Right to Sue for Charge dated April 24, 2019, related to charge number No. E-10/18-50181 was issued on behalf of the MCHR.
7. This action is timely filed within ninety (90) days from the date of Plaintiff's Notice of Right to Sue from the MCHR, in accordance with Mo. Rev. Stat. § 213.111.1, and within two years of the occurrence or reasonable discovery of the unlawful employment practices alleged herein.
8. Plaintiff has fulfilled all conditions precedent to the bringing of her claim against Defendant and has duly exhausted all administrative procedures prior to instituting this lawsuit.

RETALIATION

9. Plaintiff was employed by Defendant from May 8, 2016, until August 30, 2018.
10. In September 2017, Plaintiff asked a supervisor to keep a male co-employee out of her welding booth.
11. On or about September 25-27, 2017, Plaintiff made a report to human resources describing sex-based discrimination and harassment, including the behavior of the male co-employee who interfered with her welding.
12. On or about October 17, 2017, and on or about December 12, 2017, Plaintiff made reports to human resources describing retaliation that she believed was occurring because of the previous HR report.
13. On January 31, 2018, Plaintiff left work for a medical leave of absence.
14. On February 2, 2018, Plaintiff filed a MCHR Charge of Discrimination (E-02/18-49094) for sex-based discrimination and harassment in the workplace and retaliation by Defendant for her reports of sex-based discrimination and harassment.
15. During the period of February 1-June 5, 2018, Plaintiff was on the medical leave of absence from work, during which she had surgeries on both hands and on her left foot.
16. On June 6, 2018, Plaintiff returned to work at Defendant's facility to work as a weld repair coordinator. Plaintiff had been a weld repair coordinator since October 3, 2016.
17. Beginning June 6, 2018, Defendant assigned Plaintiff to work at a new task called "spearing on/spearing off," which was strenuous work particularly for the wrists and

thumbs on which she had just undergone surgery. Plaintiff did the “spearing on/spearing off” task in addition to her duties as a weld repair coordinator.

18. Plaintiff left work again after June 13, 2018, under orders from her doctor that she be off of work until her next appointment.

19. On June 19, 2018, Plaintiff reported to her doctor that her thumbs and left foot were swelling and in pain from the new “spearing on/spearing off” tasks she was given from June 6-13, 2018. The doctor’s note from June 19, 2018, reported that a representative of Defendant expressed concern about Plaintiff being back at work.

20. Whenever Plaintiff was on medical leave from work as an employee of Defendant, Plaintiff was exhausting her leave rights under the Defendant’s medical leave policy.

21. Defendant discharged Plaintiff from employment in a letter dated August 29, 2018, and the discharge was effective August 30, 2018. The letter stated that the discharge was a result of Plaintiff exhausting all of her medical leave rights.

22. After Plaintiff’s discharge from employment, Plaintiff received a letter from the Missouri Division of Employment Security that incorrectly stated that Plaintiff had been discharged by Defendant on July 1, 2018, for “misconduct connected with work.”

23. Retaliation was a factor in Plaintiff being required to perform the “spearing on/spearing off” task when she returned to work between June 6 and June 13, 2018. This was additionally part of a pattern and practice of Defendant of retaliation.

24. Retaliation was a factor in the Defendant assigning work to Plaintiff that compelled her to take additional medical leave and further exhaust her medical leave rights. This was additionally part of a pattern and practice of Defendant of retaliation.
25. All actions or inactions of or by Defendant, described herein, occurred by or through its agents, servants or employees, acting within the course and scope of their employment.
26. Defendant's violations of the Missouri Human Rights Act, as set forth herein, caused or directly contributed to cause damages to Plaintiff, which include mental anguish, emotional distress, embarrassment, degradation, humiliation, anxiety, loss of enjoyment of life, situational depression, loss of sleep, and pain, and other non-pecuniary losses, both past, present and in the future, all of a continuing and permanent nature.
27. This intentional conduct of Defendant described herein through its employees acting within the scope and course of their employment, was outrageous, and evidenced an evil motive or reckless and conscious indifference for the rights of Plaintiff, and to the rights of others, entitling Plaintiff to an award of punitive damages.
28. Plaintiff is also entitled to recover all costs, expenses, expert witness fees and attorney fees incurred in this matter.

WHEREFORE, Plaintiff prays for judgment against Defendant for compensatory damages and punitive damages in amounts that are fair and reasonable, for costs, expenses, interest as allowed by law, for attorney fees, and for other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on the allegations contained in this
Petition.

RAHM, RAHM & McVAY, P.C.

BY /s/ Kirk Rahm

KIRK RAHM #22530

GAYLE MCVAY #39232

CRISTINA OLSON #65079

511 Foster Lane

Warrensburg, MO 64093

(660) 747-5152 (phone)

(660) 747-1242 (facsimile)

E-Mail: office@rahmlaw.com


ATTORNEYS FOR PLAINTIFF



IN THE 18TH JUDICIAL CIRCUIT, PETTIS COUNTY, MISSOURI

Judge or Division: ROBERT L. KOFFMAN	Case Number: 19PT-CC00089	(Date File Stamp)
Plaintiff/Petitioner: SUZANNE RENEE STEINBACH	Plaintiff's/Petitioner's Attorney/Address J KIRK RAHM 511 FOSTER LANE WARRENSBURG, MO 64093	
Defendant/Respondent: MAXION WHEELS SEDALIA LLC	Court Address: 415 SOUTH OHIO SEDALIA, MO 65301	
Nature of Suit: CC Employmnt Discrmntn 213.111		

Summons in Civil Case

The State of Missouri to: MAXION WHEELS SEDALIA LLC Alias: 3610 W MAIN ST SEDALIA, MO 65301 COURT SEAL OF  PETTIS COUNTY		You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition. <i>July 23, 2019</i> SUSAN SADLER by /s/ Cindi Ross _____ Date Clerk
Further Information:		

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____.

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$._____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

LAW OFFICES
RAHM, RAHM & McVAY, P.C.

511 FOSTER LANE
WARRENSBURG, MISSOURI 64093

ATTORNEYS:
KIRK RAHM
GAYLE MCVAY
CRISTINA OLSON

www.rahmlaw.com
office@rahmlaw.com
660-747-5152 (Phone)
660-747-1242 (Fax)

OFFICE MANAGER
SUE SMITH

July 26, 2019

Pettis County Circuit Clerk
415 S. Ohio Ave.
Sedalia, MO 65301

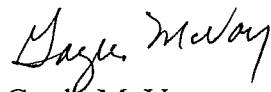
Re: Suzanne Renee Steinbach vs. Maxion Wheels Sedalia LLC
Case No. 19PT-CC00089

Ladies and Gentlemen:

We are requesting that the Summons issued July 23, 2019 to Maxion Wheels Sedalia LLC be reissued to show service to the Registered Agent CSC-Lawyers Incorporating Service Company, 221 Bolivar Street, Jefferson City, MO 65101.

Thank you.

Yours truly,


Gayle McVay



IN THE 18TH JUDICIAL CIRCUIT, PETTIS COUNTY, MISSOURI

Judge or Division: ROBERT L. KOFFMAN	Case Number: 19PT-CC00089	(Date File Stamp)
Plaintiff/Petitioner: SUZANNE RENEE STEINBACH	Plaintiff's/Petitioner's Attorney/Address J KIRK RAHM 511 FOSTER LANE WARRENSBURG, MO 64093	
Defendant/Respondent: MAXION WHEELS SEDALIA LLC	Court Address: 415 SOUTH OHIO SEDALIA, MO 65301	
Nature of Suit: CC Employmnt Discrmntn 213.111		

Summons in Civil Case

The State of Missouri to: MAXION WHEELS SEDALIA LLC

Alias:

REGISTERED AGNT
CSC- LAWYERS INC SERVICE CO
221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF



PETTIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

July 26, 2019

Date

SUSAN SADLER by /s/ Cindi Ross

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 18TH JUDICIAL CIRCUIT, PETTIS COUNTY, MISSOURI

RECEIVED

JUL 31 2019

COLE COUNTY
SHERIFF'S OFFICE


Judge or Division: ROBERT L. KOFFMAN	Case Number: 19PT-CC00089
Plaintiff/Petitioner: SUZANNE RENEE STEINBACH	Plaintiff's/Petitioner's Attorney/Address J KIRK RAHM 511 FOSTER LANE WARRENSBURG, MO 64093
Defendant/Respondent: MAXION WHEELS SEDALIA LLC	Court Address: 415 SOUTH OHIO SEDALIA, MO 65301
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: **MAXION WHEELS SEDALIA LLC**
Alias:

REGISTERED AGNT
CSC- LAWYERS INC SERVICE CO
221 BOLIVAR STREET
JEFFERSON CITY, MO 65101
COURT SEAL OF


PETTIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

July 26, 2019 Date SUSAN SADLER by /s/ Cindi Ross Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent, a person of the defendant's/respondent's family, or the place of 15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: CSC Lawyers, S.C. (name) Designee (title).

☐ other: _____

Served at 350 E. High St (address)
in Cole (County/City of St. Louis), MO, on 08-02-19 (date) at 800 AM (time).

Sheriff John P Wheeler by Sgt Aimee Wray
Printed Name of Sheriff or Server Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

485.06